

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA
WHEELING DIVISION**

**IN RE: MONITRONICS INTERNATIONAL,
INC., TELEPHONE CONSUMER PROTECTION
ACT LITIGATION**

No. 1:13-md-02493-JPB-JES

THIS DOCUMENT RELATES TO:

ALL CASES

MOTION FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 11

Class Member Catherine Smith moves for an order that Plaintiffs' counsel Jonathan R. Marshall and Beth E. Terrell, and their respective firms be sanctioned \$1,500, to be paid to the Court, publicly admonished, and advised not to repeat the violation described in the Memorandum of Law filed in support of this motion. In support of her request, Ms. Smith refers the Court to the accompanying Memorandum of Law, and Declaration of John W. Davis.

Date: April 22, 2018

Respectfully submitted,

s/ Courtland Creekmore

Courtland Creekmore
4832 N. Fairfax Drive #5
Arlington, VA 22203
415-528-8995
courtland.creekmore@gmail.com

John W. Davis
Law Office of John W. Davis
501 W. Broadway, Suite 800
San Diego, CA 92101
(619) 400-4870
john@johnwdavis.com

C. Benjamin Nutley
1055 E. Colorado Blvd., 5th Floor
Pasadena, California 91106
Telephone: (626) 204-4060
Facsimile: (626) 204-4061
nutley@zenlaw.com

Salene Mazur Kraemer
331 Jonquil Place
Pittsburgh, PA 15228
(858) 263-9581
salene@mazurkraemer.com

Counsel for Class Member Catherine Smith

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses for counsel of record including the following:

Beth E. Terrell
Email: bterrell@terrellmarshall.com
Mary B. Reiten
Email: mreiten@terrellmarshall.com
TERRELL MARSHALL LAW GROUP
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
Telephone: (206) 816-6603
Facsimile: (206) 319-5450

Jonathan R. Marshall
Email: jmarshall@baileyglasser.com
John W. Barrett
Email: jbarrett@baileyglasser.com
BAILEY & GLASSER LLP
209 Capitol Street
Charleston, West Virginia 25301
(304) 345-6555
(304) 342-1110 (fax)

Jeffrey A. Holmstrand
Email: jholmstrand@grovedelklaw.com
GROVE HOLMSTRAND & DELK, PLLC
44-1/2 15th Street
Wheeling, West Virginia 26003
(304) 905-1961
(304) 905-8628 (fax)

Meryl C. Maneker
Email: mmaneker@wilsonturnerkosmo.com
WILSON TURNER KOSMO LLP
550 West C Street, Suite 1050
San Diego, California 92101
(619) 236-9600
(619) 236-9669 (fax)

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: April 22, 2018

s/ Courtland Creekmore
Courtland Creekmore